

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Go Airlines (India) Limited,

*Petitioner,*

v.

International Aero Engines, LLC, a Delaware  
Limited Liability Company,

*Respondent.*

Misc. Case No. 1:23-mc-00249-RGA-LDH

**STIPULATION AND PROPOSED ORDER FOR FILING UNDER SEAL**

WHEREAS:

A. On April 28, 2023, Petitioner Go Airlines (India) Limited (“GoFirst”) filed the Emergency Petition and Motion to Confirm Arbitration Awards (D.I. 2, the “Emergency Petition”) and related papers, including the Declaration of Kabir Bhalla in support of the Emergency Petition (D.I. 4), which attached as exhibits certain contracts between GoFirst and Respondent International Aero Engines, LLC (“IAE”);

B. IAE contends that four exhibits filed with the Emergency Petition—the “FMP Agreement,” the “Engine Agreement,” the “Pre-Payment Letter,” and the “Binding MOU” (together, the “Agreements”)—contain provisions requiring their terms to be kept confidential, and IAE further contends that several other exhibits are required to be kept confidential under Singapore International Arbitration Centre Rules;

C. To avoid the parties’ disagreement over the Agreements distracting from or delaying the resolution of the Emergency Petition, GoFirst has agreed to remove the Agreements from the docket and refile them under seal;

D. The parties anticipate the possibility of filing certain additional documents that IAE contends are confidential, or which refer to confidential information or proceedings, in opposition to and reply in further support of the Emergency Petition and any other motions related to it;

E. Good cause exists for the entry of an order permitting the parties to file confidential documents under seal;

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties, subject to the approval of the Court, that:

1. The Agreements (D.I. 2-4, 2-5, 2-6) shall be stricken from the docket;
2. GoFirst shall promptly re-file the Agreements under seal, subject to compliance with District of Delaware Local Rule 5.1.3 and the CM/ECF Procedures;
3. The parties otherwise reserve their rights and arguments with respect to the original filing of the Agreements; and
4. The parties are granted leave to file documents under seal in accordance with District of Delaware Local Rule 5.1.3 and the CM/ECF Procedures.

REED SMITH LLP

WILSON SONSINI GOODRICH  
& ROSATI, P.C.

/s/ Brian M. Rostocki

Brian M. Rostocki (#4599)  
Anne M. Steadman (#6221)  
1201 Market Street, Suite 1500  
Wilmington, DE 19801  
(302) 778-7500  
brostrocki@reedsmith.com  
asteadman@reedsmith.com

/s/ Kaitlin E. Maloney

Andrew D. Cordo (#4534)  
Kaitlin E. Maloney (#6304)  
222 Delaware Avenue, Suite 800  
Wilmington, Delaware 19801  
(302) 304-7600  
acordo@wsgr.com  
kmaloney@wsgr.com

*Attorneys for Respondent International Aero  
Engines, LLC*

*Attorneys for Petitioner Go Airlines (India)  
Limited*

Dated: May 11, 2023

It is SO ORDERED this \_\_\_\_\_ day of May, 2023.

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Magistrate Judge Laura D. Hatcher